

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY

SALERNO MEDICAL ASSOCIATES, LLP,

Plaintiff,

v.

INTEGRITY PRACTICE SOLUTIONS, LLC;
INTEGRITY MEDICAL SYSTEMS, LLC;
CHINTAN TRIVEDI; JOHN DOES 1-10; and
ABC CORPORATIONS 1-10,

Defendants.

Docket No.

Civil Action

**DECLARATION OF
DARLENE SERRANO REITER**

I, Darlene Serrano Reiter, of full age, declare as follows:

1. For nearly two decades, I have been employed by the plaintiff, Salerno Medical Associates, LLP (“SMA”), in the above-captioned matter. My current title is Practice Development Manager. In that role and prior SMA roles, I have been involved in SMA’s administration and ongoing review of its contractual arrangements with SMA’s vendors, including, at times, defendants, Integrity Medical Systems, LLC (“IMS”) and Integrity Practice Solutions, LLC (“IPS”), and their owner, co-defendant Chintan Trivedi (“Mr. Trivedi”). I have personal knowledge of the facts I declare herein.

2. Over the course of SMA’s and IMS’s years’ long business relationship, SMA has entrusted IMS with the protected health information (“PHI”) of approximately 16,000 patients. Such PHI includes, without limitation, patients’ names, patients’ telephone numbers, patients’ addresses, patients’ medical records, patients’ radiograph images, laboratory results, and other information and documents regarding a patient’s health status and the provision of, and payment for, medical services provided to patients (the “SMA Patient Data”).

3. On Friday, October 11, 2019, in an effort to facilitate a resolution of a billing dispute that had emerged between my employer, SMA, and IMS, IPS, and Mr. Trivedi, I attended a meeting with Mr. Trivedi, SMA's legal counsel, Alexander Salerno, M.D. (SMA's owner), and others. Unfortunately, however, the parties did not resolve the billing dispute during this meeting.

4. On Monday, October 14, 2019, I engaged in a lengthy telephone conversation with Mr. Trivedi to follow-up on the October 11, 2019 meeting.

5. During that call, Mr. Trivedi affirmatively threatened to "dump" the SMA Patient Data from IMS servers if SMA refuses to pay amounts Mr. Trivedi claims that SMA allegedly owes to IMS and IPS. Mr. Trivedi also made clear that, at a minimum, he would never release the SMA Patient Data to SMA unless and until SMA acquiesces to his extortionary demands.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Dated: June 10, 2020



The image shows a handwritten signature in black ink. The signature consists of several loops and strokes that form the name "Darlene Serrano Reiter". Below the signature, there is a horizontal line that ends in a small flourish.

Darlene Serrano Reiter